

REMARKS

In the Office Action dated May 16, 2005, a more descriptive title was required, and in response the original title has been amended.

An informality in claim 5 was noted, which has been corrected.

Claims 1-16 were rejected under 35 U.S.C. §102(b) as being anticipated by Su. This rejection is respectively traversed for the following reasons.

In substantiating the rejection of independent claim 1 based on the teachings of the Su reference, the Examiner stated the Su reference discloses a closed housing surrounding a magnetic resonance surface coil. The Examiner identified elements 2, 3 and 5 in the Su reference as forming such a closed housing. As a first distinction between the subject matter of claim 1 and the structure disclosed in the Su reference, Applicants do not agree that the elements 2, 3 and 5 in the Su reference form a *closed* housing. In order to further emphasize this point, claim 1 has been amended to refer to the housing as being *completely* closed.

If elements 2 and 3 are considered by the Examiner to be a part of an alleged "housing" in the Su reference, it is essential to the intended operation of the structure disclosed in the Su reference that sufficient clearance be provided between the upper section 2 and the bottom section 3 to allow easy access to all tissues of a breast located in one of the openings 16a or 16b, as explicitly stated in the Su patent at column 4, line 27-40. A "housing" including elements 2 and 3 in the Su reference, therefore, is not a completely closed housing.

Moreover, the Examiner first referred to the openings 16a and 16b in the Su reference as corresponding to the "access opening" in claim 1, but then referred to dimensions of other elements, namely the dimensions between the V-shaped plate 2

and the planar flat plate 3, as allegedly corresponding to the first and second dimensions of claim 1.

Moreover, the Examiner ignored the language in claim 1 requiring the access opening to communicate with a cavity disposed in an interior of the housing. Since the space between the plates 2 and 3 in the Su reference is open on all sides, it does not correspond to a "cavity" in the housing.

As explained in the present specification, the purpose of the aforementioned access opening in the closed housing in the subject matter of claim 1 is to allow the coil unit to be manually lifted from a patient bed of a magnetic resonance imaging apparatus. There is no indication whatsoever that the vertical posts 4, which are the only structural elements connecting the plates 2 and 3, would permit the coil unit disclosed in the Su reference to be lifted, without those posts breaking or otherwise becoming damaged. Claim 1 has been amended to make clear that the access opening is structurally integrated with the closed housing to allow lifting of the closed housing using the gripper part formed by the access opening. There is no indication whatsoever in the Su reference that any part of the housing that (allegedly) includes the upper section 2 could be lifted by gripping any part of the upper section 2, without damaging the overall unit.

The Su reference therefore, does not disclose all of the elements of claim 1 as arranged and operating in that claim, and therefore does not anticipate claim 1, or any of the claims depending therefrom.

As a separate argument in support of the patentability of claim 12, however, Applicants submit the Examiner has not provided any substantiation whatsoever that the alleged recessed grip on the Su reference is disposed at the height of the center

of gravity of the housing. In view of the spacing between the plates 2 and 3, it is clear that the center of gravity of the unit shown in Figure 1 of the Su reference will be somewhere inside the base housing portion 5. No part of the structure that the Examiner alleges conforms to the grip or access opening in the Su reference is, or could be, disposed within the base housing portion 5. Therefore, there is no recessed grip of any sort disclosed in the Su reference that is disposed at the height of the center of gravity of the housing, as required in claim 12.

All claims of the application are therefore submitted to be in condition for allowance, and early reconsideration of the application is respectfully requested.

Submitted by,



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